

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION**

MELVIN INGRAM;  
SHANTEL ADAMS;  
DAVID BECK;  
DWYANE BOWENS;  
ALFREDO CARDENAS;  
VERONICA CLEAVES;  
MARCUS COCHRAN;  
ROBERT COLUCCI;  
LESLIE CREWS;  
ERIC FLAKE  
JACOB GREENWELL;  
LAWONDA HODGES;  
LAROME HUMPHREY;  
ROBERT KATALTEPE;  
JOHN LINTNER;  
KEESHA MCCLINTON;  
LAKISHA MCCOY;  
CLIFTON MCCOY;  
DEDRECK MCVAY;  
HARRY OLIVER;  
DARRELL ONSBY;  
FREDERICK RAYFORD;  
JOHN RILES;  
ASHLEY ROBERTSON;  
DEANDRE ROSSER;  
DUSTIN RUSSELL;  
PATRICK SHAW;  
CEDRIC TAYLOR  
JESSE TOWNSEND; and  
STEVEN WESBY;

Individually and as potential class  
Representatives for all similarly  
Situated claimants

<b>PLAINTIFFS</b>	)	
VS.	)	<b>NO:2:17-cv-02795</b>
BILL OLDHAM, in his individual capacity and in his official capacity as the Sheriff of <b>CIVIL</b>	)	<b>CLASS ACTION COMPLAINT FOR VIOLATIONS OF THE</b>
Shelby County, Tennessee; ROBERT MOORE, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity and in her official capacity as the of Assistant Chief Jail Security of Shelby County, Tennessee;	)	<b>RIGHTS ACT OF 1871, 42 U.S.C. §1983 &amp; TENNESSEE COMMON LAW</b>
DEBRA HAMMONS, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; and TYLER TECHNOLOGIES, INC., a foreign corporation, and other unknown and unnamed Individuals and Entities,	)	<b>JURY TRIAL DEMANDED PURSUANT TO FED. R. CIV. P. 38(a) &amp; (b)</b>

## DEFENDANTS

## NOTICE OF APPEARANCE

Comes Now, Daniel Lofton and gives notice of appearance as counsel for Plaintiffs in this cause.

Respectfully submitted,

\_\_\_\_/s/ Daniel Lofton\_\_\_\_\_  
Daniel Lofton, #27386  
2400 Poplar Ave., Ste. 210  
Memphis, TN 38112  
901-849-5256

CERTIFICATE OF SERVICE

I, Daniel Lofton, do hereby certify that I have caused to be delivered a true copy of the foregoing document to all counsel of record via the Court's electronic case filing system (ECF) on this the 14<sup>th</sup> day of November, 2017.

Submitted,

\_\_\_\_/s/ Daniel Lofton\_\_\_\_\_  
Daniel Lofton